

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

DAVID COES,

*Plaintiff*

Case No. 1:24-cv-00035-WES-LDA

vs.

COMMUNITY COLLEGE OF RHODE  
ISLAND, SUZANNE CARR, MADDIE  
JOSEPHS, PAULA CARDILLO,  
ROSEMARY COSTIGAN, TRACY  
KARASINSKI, ROBERT CIPOLLA,  
in their official capacities,

*Defendants*

2025 JUN -9 P 12:00  
FILED  
U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

Plaintiff's Pre-Conference Statement

*Facts:*

I David Coes, Plaintiff, was told via email from Defendant Paula Cardillo not to return to my internship at Miriam Hospital for the Community College of Rhode Island's Diagnostic Medical Sonography Program on October 14, 2022. Cardillo refused to answer any emails when asked, "What was going on?"

Defendant Tracy Karasinski then contacted me on October 17, 2023, stating that I had to go to CCRI to discuss the nature of the allegations. Karasinski refused to discuss any of the allegations with me.

On October 20, 2022 I attended a meeting with Suzanne Carr, Tracy Karasinski, Robert Cipolla and Police Chief Joseph Hopkins. At the meeting Carr dismissed me from the Sonography Program at the College. She would not elaborate why stating that she didn't know what happened because she was not there.

Tracy Karasinski and Robert Cipolla denied knowing the nature of the allegations, however, emails obtained clearly show that both Karasinski and Cipolla were indeed aware of the allegations.

I was then given an option to file a grievance for a grade or academic decision and was denied the use of the normal disciplinary procedures set by CCRI. The Committee does not ascertain as the validity of the accusations, they assume all accusations are true and then make a decision as to whether or not the academic decision fits the accusations. The accusations are automatically considered to be true by the Committee. Also, the committee has no power or authority to change any decision made by a professor.

After attending the conference with the Grievance Committee, the Committee then contacted Suzanne Carr and Maddie Josepfs to gather more information. Carr then came up with new accusations and facts, which the Committee automatically assumes are true. I was given no chance to deny the new allegations against me.

Some time later, around July 30, 2023 Plaintiff went to speak to Chief Joseph Hopkins at CCRI. Chief Hopkins was able to get new Dean of Students Taiwo Adefiyiju to investigate the

situation. Her investigation led her to report the Defendants to Human Resources at CCRI for employee misconduct.

Later, I was contacted by Dean Adefiyiju and had a meeting with her and Chief Hopkins. An amicable solution to the issue was unable to be reached and as a result I have filed this lawsuit.

The Amended Complaint contains significant other allegations against the Defendants, which the Plaintiff now believes to be irrelevant due to the Court's dismissal of Count 2, Intentional Infliction of Emotional Distress.

*Legal Issues:*

The main legal issue is whether I, the Plaintiff, was afforded adequate due process rights under the 5th and 14th Amendments. Secondly, the differing due process rights afforded to students regarding both academic and disciplinary dismissals, and lastly whether or not the Defendants have an affirmative defense for their actions.